

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FOX VALLEY LABORERS HEALTH AND)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
v.)	NO. 19 C 405
)	
NERI CONTRACTORS AND EXCAVATORS,)	JUDGE RONALD A. GUZMAN
INC., an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, NERICONTRACTORS AND EXCAVATORS, INC., an Illinois corporation, in the total amount of \$33,344.35, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,425.75.

On January 29, 2019, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 19, 2019. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Catherine M. Chapman

Catherine M. Chapman
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 26th day of February 2019:

Mr. Ronald W. Magee, Registered Agent
Neri Contractors and Excavators, Inc.
20856 N. Rand Road
Kildeer, IL 60010-3707

/s/ Catherine M. Chapman

Catherine M. Chapman
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